

Exhibit 3

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ADSTRA LLC,

Plaintiff,

v.

Case No.

KINESSO LLC and ACXIOM LLC,

24-CV-02639

Defendants.

CONFIDENTIAL VIDEOTAPED DEPOSITION OF

BRYAN DONOVAN

DATE: Wednesday, September 11, 2024

TIME: 2:06 p.m.

LOCATION: Remote Proceeding

Jefferson, MA 01522

REPORTED BY: Andrew Halstead

1 B. DONOVAN

2 customers last fall.

3 Q That's the fall of 2023?

4 A I believe so.

5 Q Do you know what month?

6 A I don't.

7 Q Okay. And does Acxiom currently
8 sell or license a real ID referential
9 graph to customers?

10 A My understanding is that is a
11 product offering. I don't know whether we
12 have customers or which customers may be
13 using that today.

14 Q You don't know if there's any
15 customer of Acxiom that has licensed the
16 Real ID referential graph?

17 MR. SHAFTEL: Objection. Lack of
18 foundation.

19 A No. I don't.

20 Q Okay. Who would know that?

21 MR. SHAFTEL: Objection. Lack of
22 foundation.

23 A I presume Kyle Hollaway, who
24 manages the Real ID product.

25 Q Would anybody else know -- be